

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ETHICON WAVE 13 CASE LISTED IN PLAINTIFFS' EXHIBIT A	

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE OF
STEVEN GOLDWASSER, M.D. FOR WAVE 13**

Plaintiffs filed a Notice of Adoption (Doc. No. 8931) in the Wave 13 case identified in Exhibit A to their Notice, adopting their Motions to Exclude Expert Testimony of Steven Goldwasser, M.D., Doc. Nos. 3677/3678/3864 ("Plaintiffs' Wave 4 Motion") and Doc. Nos. 4365/4372 ("Plaintiffs' Wave 5 Motion").

Defendants hereby adopt and incorporate by reference their prior *Daubert* responses in Wave 4, Doc. No. 3754 and in Wave 5, Doc. No. 4553 as their response for Wave 13. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 4 and 5 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561

william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)

Thomas Combs & Spann PLLC

300 Summers Street

Suite 1380 (25301)

P.O. Box 3824

Charleston, WV 24338

(304) 414-1800

srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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